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1198010003

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*ADMITTED IN
DC, TX, VA ONLY

May 6, 2008

Re: Request for Information ("RI") Pursuant to Section 4(e) of the Illinois Environmental Protection Act, (Act, 415 Illinois Compiled Statutes (ILCS) 5/4(e) and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, (CERCLA or Superfund, 42 United States Code (U.S.C.) § 9601, et seq.).

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Chemetco Site
ILD 048 843 809
Hartford/Madison County
Superfund/Technical Reports

FILE COPY

Dear Mr. Rednour:

By letter dated May 5, 2008 I transmitted to you the response of SP Recycling Corporation ("SPRC") to the above referenced RI with respect to the Chemetco, Inc. Site in Hartford, Illinois.

Enclosed herewith is a corrected copy of the Response of SP Recycling Corporation to the Questions in Attachment B to the RI. Please substitute this copy for the one sent to you on May 5, 2008.

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Thank you in advance for your cooperation.

Yours sincerely,

CAHILL GORDON & REINDEL LLP

By: 
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Counsel for SP Recycling Corporation

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[Enclosure]

cc: Techlaw
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(with enclosure)

Response of SP Recycling Corporation to the Questions in Attachment B to the Request for Information, dated February 22, 2008, from IEPA regarding the Chemetco Site (May 5, 2008)

1.Q: Identify the person(s) answering this Information Request on behalf of the Respondent

A: Michelle Thornhill, VP Operations, SP Recycling Corporation ("SPRC"), 245 Peachtree Center Avenue, Atlanta, GA 30303, (404) 979-6653.

2.Q: Identify all person(s) consulted in the preparation of the answers to these questions.

A: (i) Tom Hahn, President SPRC, 245 Peachtree Center Avenue, Atlanta, GA 30303, (404) 979-6608.

(ii) Fred Johnson, Corporate Director of Operations SPRC, 245 Peachtree Center Avenue, Atlanta, GA 30303, (404) 979-6629.

(iii) Darrin Hardy, Plant Manager – Louisville, KY facility of SPRC, 2000 Industrial Blvd., Louisville, KY 40219, (502) 969-3846.

(iv) Joanne Wright, Division Clerk – Louisville, KY facility of SPRC, 2000 Industrial Blvd., Louisville, KY 40219, (502) 969-3846.

(v) Glenn Giddens, former SPRC Controller (currently consultant to SPRC), SPRC, 245 Peachtree Center Avenue, Atlanta, GA. 30303, 404-979-6649).

(vi) Mike Murphy, former Plant Manager, Louisville, KY facility of SPRC, c/o Smurfit Stone Corporation, Columbus, Ohio 43207, (614-205-7339).

3.Q: Identify the parent corporation and all subsidiaries of the Respondent.

A: Respondent: (i) Legal name: SP Recycling Corporation ("SPRC"); (ii) Date and State of incorporation: January 11, 1978, Georgia; (iii) Address: 245 Peachtree Center Ave, Suite 1800, Atlanta, GA 30303; (iv) business— SPRC operates 23 recycling facilities in the southeastern United States, including a recycling facility located at 2000 Industrial Blvd., Louisville, KY 40219 (the "Louisville Facility"). SPRC leases land for the Louisville Facility from Republic Services of Kentucky, LLC ("RSK"). SPRC purchased the recycling assets at the Louisville Facility from RSK and took control of its operations on August 6, 2001.

Parent of Respondent: (i) Legal name—SP Newsprint Co., LLC ("SPN"); (ii) SPN is a Georgia LLC; (iii) Address—245 Peach Tree Center Ave, Atlanta, GA 3030; (iv) Business—produces newsprint and operates two recycled paper mills.

4.Q: Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide copies of all such documents.

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A: SPRC specifically objects to this question as overly burdensome, vague, ambiguous and beyond the authority of the Illinois Environmental Protection Agency ("IEPA"). Without waiving these and other available objections, SPRC answers as follows: the documents listed below were identified as responsive and copies are provided herewith (numbered as indicated below):

- (i) Copies of invoices for sales of materials by SPRC to the Site. (SPRC 0001-0007).
- (ii) Copies of Bills of Lading for sales of materials by SPRC to the Site. (SPRC 0002, 0004, 0008-0016).
- (iii) Copy of check received by SPRC from Chemtco for shipments of materials to the Site. (SPRC 00018-0019).
- (iv) Correspondence from Chemtco to SPRC. (SPRC 0020-0035).
- (v) Accounts Receivable Records of SPRC. (SPRC 0017).
- (vi) SPRC Insurance Policies. (SPRC 0036-0107).

5.Q: If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons. Provide the current or most recent known address and telephone number of each individual identified.

A: RSK owned and operated the Louisville Facility prior to August 6, 2001 and, to the knowledge of SPRC, sold recyclable materials to Chemtco for use at the Site. Persons at RSK who may have knowledge or documents of the kind requested include John Lamanna, RSK Area President, 4000 Park Central Ave., Nicholasville, KY 40356 (telephone no. 859-881-6051).

6.Q: Describe your company's business activities which resulted in sending material to the Chemtco Site.

A: SPRC operates several recycling facilities which recycle old newspapers, old corrugated boxes, other paper grades, plastics, aluminum and steel from various sources. As noted above, SPRC commenced operating the Louisville Facility on August 6, 2001.

The Louisville Facility purchases recyclable material from the City of Louisville, KY curbside program, which provides for the collection of household recyclables deposited by households in bins placed by the city on the curbs of homes. The homeowners place containers (aluminum, tin, glass and plastics) in one bin and fiber products (old newspapers, corrugated boxes and other paper items) in

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another bin. Homeowners are required by the program to remove paper labels from the containers before placing them in the bins. The containers and fiber products are stored separately in the collection trucks. The materials are weighed then dropped at SPRC's Louisville Facility.

At the Louisville Facility, the containers are fed through a sort line where trained sorters further separate any garbage and non-recyclable materials from the recyclable materials such as post-consumer tin food containers. Tin post-consumer food containers are culled out by a magnetic head and dropped in a bin separate from the other containers. The tin containers are then compressed in a baler and sold to businesses that re-melt it in place of virgin materials. SPRC continued to sell tin post-consumer food containers to former customers of RSK, including Chemetco at the Site, after taking over operation of the Louisville Facility on August 6, 2001.

7.Q: Identify all persons having knowledge or information about the generation, transportation to, treatment, disposal, or other handling of hazardous substances (including materials containing lead, cadmium, boron, copper, iron, manganese, mercury, nickel, selenium, sulfate, zinc or other heavy metals), by you, your contractors, subcontractors or by prior owners and/operators which relates or may relate to the Chemetco Site, including but not limited to persons who arranged for disposal of or transported hazardous substances to the Chemetco Site.

A: SPRC objects specifically to this question as vague, ambiguous and calling for legal conclusions. Without waiving these and other available objections, SPRC answers as follows: see answers to Questions 2 and 5 above for persons who may have information concerning dealings with Chemetco.

8.Q: Describe your policies and procedures for the handling, treatment, storage and/or disposal of hazardous substances encountered in the course of your activities at the Site. Provide copies of records relating to this policy as well as to its implementation.

A: SPRC specifically objects to this question as vague, ambiguous and calling for legal conclusions. Without waiving these and other available objections, SPRC answers as follows: SPRC did not conduct any activities at the Site. Chemetco arranged for all shipping and transport of materials sold by SPRC to Chemetco from the Louisville Facility to the Site, as well as the handling of the materials at the Site.

9.Q: Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). For each, indicate the dates of the individual's employment and the nature of the individual's duties and responsibilities, and a description of the type of environmental information that the individual would possess.

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- A:
- (i) Mike Murphy: former plant manager at the Louisville Facility (1996-2/15/03). He was responsible for day to day activities including purchasing, processing and selling recyclable materials, and environmental compliance.
 - (ii) Darrin Hardy: current plant manager of the Louisville Facility with general responsibility for environmental compliance.
 - (iii) Tiffany Carter: current H/R Manager at the SPRC corporate office in Atlanta, GA and oversees environmental compliance (9/6/05 to present).
 - (iv) Ben Knight: former H/R manager at SPRC's corporate office in Atlanta, GA who oversaw environmental compliance (left SPRC 8/31/05).

10.Q: Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. 9627, sent to the Chemetco Site.

- A:
- (i) The post-consumer tin food containers sold by SPRC to Chemetco met the commercial industry specification for such recyclable materials, ISRI Ferrous Scrap (FS-01) Code 213.
 - (ii) A market existed for these materials. This is evidenced by: sales to Chemetco at the prevailing market price; absence of returns by Chemetco; and the fact that after ceasing to do business with Chemetco, SPRC continued to sell these materials to other customers for the same use, e.g., Tube City Division, Tube City IMS Corporation, P.O. Box 2000, Glassport, PA 15045 ("Tube City").
 - (iii) SPRC understood that the recyclable material was being provided for use as feedstock for the manufacture of new saleable products, based on: the nature of the materials sold to Chemetco; the market price paid for them; and Chemetco's arranging and paying for transportation of the materials to the Site.
 - (iv) The recyclable tin sold by SPRC to Chemetco was a replacement for virgin raw material.
 - (v) SPRC understood that: the Site was re-melting the metal properly and complying with all applicable laws and in accordance with industry practice; Chemetco was an established customer of RSK, the previous operator of the Louisville Facility, and agreed to pay SPRC the prevailing market price for the materials. SPRC continued to sell recyclable tin to Chemetco at the Site because the prior operator did not identify any issues regarding Chemetco.

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11.Q: Was any shipment of material sent to the Chemtco Site ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.

A: No.

12.Q: Was any material shipment sent to the Chemtco Site ever subject of a change in payment terms because of increase of handling costs or any problem with the material sent to the Site? If so, describe this event in detail, including its cause and outcome.

A: No.

13.Q: Provide copies of the Material Data Safety Sheets for any materials disposed of or shipped to or stored at the Chemtco Site.

A: SPRC does not have MDS sheets for the recyclable tin shipped to Chemtco.

14.Q: Have you ever received a formal Information Request [similar to this one] from local, state or federal government concerning the recycling of materials at other scrap yards? Provide a copy of the Request and your response.

A: No.

15.Q: Specify whether your company was ever the subject of legal action by any party, including the government, by virtue of your transportation of hazardous substances or other waste materials to the Site. If so, describe in detail and provide any records associated with such legal action.

A: SPRC has not been subject to any legal action related to the transportation of materials to the Site.

16.Q: Identify all liability insurance policies held by Respondent from the period you transported materials or other waste materials to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration date for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. Provide complete copies of all relevant insurance policies.

A: SPRC specifically objects to this question as beyond the agency's authority and irrelevant to the subject matter of this RI. Moreover, SPRC did not transport any materials to the Site. Without waiving these or other available objections, SPRC answers as follows: SPRC held the following liability insurance policies with Traveler's Property Casualty:

(i) Insurer name: Travelers Property Casualty

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- (ii) Insurer address: One Tower Square, Hartford, CT 06183
- (iii) Policy aggregate limit: \$5 MM
- (iv) Commencement and termination dates: one policy for the period 10/1/2000 – 10/01/01, and a similar policy for the period 10/01/01-10/01/02.
- (v) Policies contained a pollution exclusion and do not cover sudden or non-sudden environmental accidents.
- (vi) A copy of the Policy for the period 10/01/01-10/01/02 is enclosed. (SPRC 0036-0107).

17.Q: List all USEPA, RCRA and State of Illinois Identification Number(s) of your company.

A: None.

18.Q: Identify all transactions or agreements for disposal in which your company disposed of, arranged for the disposal or treatment of, transported, or arranged for the transportation of any material or item, scrap materials, waste materials to the Site (including but not limited to drosses, slags, sludges, powders, or combustible materials).

A: SPRC specifically objects to this question as vague, ambiguous and calling for legal conclusions. Without waiving these and other available objections, SPRC answers as follows: SPRC sold recyclable post-consumer tin food containers to Chemetco for use as a substitute for virgin raw materials as follows:

Ship date	Invoice #	Commodity	Pounds	Tons	Price/Ton	Invoice Amount
8/7/2001	53000264	Tin	45,280	22.64	\$30.00	\$679.20
8/30/2001	53000307	Tin	42,960	21.48	\$30.00	\$644.40
9/4/2001	53000668	Tin	45,980	22.99	\$27.00	\$620.73
9/21/2001	53000672	Tin	42,000	21.00	\$30.00	\$630.00
10/12/2001	53000677	Tin	46,780	23.39	\$27.00	\$631.53
TOTAL/AVERAGE			223,000	111.50	\$28.75	\$3,205.85

In the Chemetco Materials Quantities Report by Supplier and Date, dated March 12, 2008, prepared for IEPA by TechLaw, Inc., and provided to SPRC by IEPA, TechLaw includes a list of alleged suppliers of materials to Chemetco. TechLaw's list attributes 1,048,292 pounds of tin cans allegedly sent to Chemetco to SPRC's Louisville Facility. As indicated above, information available to SPRC shows that SPRC sold only 223,000 pounds of recyclable tin to Chemetco; the remaining 825,292 pounds reported by TechLaw were not provided by SPRC,

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and if sent, were presumably provided by the former operator of the Louisville Facility.

- (a) Identify whether the materials were sent pursuant to a contractual arrangement and, if so, describe the terms of that arrangement.

A: The sales to Chemetco were made individually when materials were available. SPRC would call Chemetco when a load of recyclable material was available to ship and negotiate a market price at that time. Chemetco would then be assigned an SPRC release number and Chemetco would arrange and pay for the shipping of the material to its Site.

- (b) Identify whether the materials were delivered directly to the Chemetco Site or were trans-shipped from another intermediate delivery point. If applicable, describe each such delivery point.

A: Transportation of the materials from the Louisville Facility to the Site was arranged and paid for by Chemetco. To the knowledge of SPRC, the materials were transported directly to the Site.

- (c) Identify the persons involved in sending such material to the Site.

A: SPRC's scale clerks would schedule the load once they received a release number. Various plant personnel would load the trucks sent by Chemetco once they arrived at the Louisville Facility. The trucks were weighed in and out at the Louisville Facility but the invoice weight was provided by Chemetco once the materials were received. This is common practice with recyclable metals.

- (d) State the dates on which each such person may have transported or delivered such material for transport.

A: See table of shipments in response to subsection (a) above.

- (e) Describe the source of or the process that produced the materials.

A: See answer to Question 6 above.

- (f) Describe the materials or items, including type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.

A: The materials were post-consumer tin food containers that met the commercial specification for such recyclable materials, ISRI Ferrous Scrap (FS-01) Code 213. See also answer to Question 6 above.

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- (g) Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.

A: SPRC specifically objects to this question as calling for a legal conclusion. Without waiving this and other available objections, SPRC answers as follows: see answer to subsection (f) above.

- (h) State whether any of the material was ever tested by your company and if so, whether the hazardous substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. 261, Subpart C.

A: SPRC specifically objects to this question as calling for a legal conclusion. Without waiving this and other available objections, SPRC answers as follows: SPRC did not test the materials sold to Chemetco.

- (i) Describe what was done to materials once they were brought to the Chemetco Site, including any further processing of the materials.

A: It was SPRC's understanding based on industry practice, the nature of the materials purchased by Chemetco, and the nature of the sales transactions with Chemetco, that the materials were melted and used in place of virgin raw materials by Chemetco at the Site.

- (j) Describe as precisely as possible any and all of the locations at which each hazardous material involved in such transactions actually was disposed of or treated.

A: SPRC specifically objects to this question as vague, ambiguous and calling for a legal conclusion. Without waiving these and other available objections, SPRC answers as follows: SPRC has no information of the kind requested.

- (k) Describe any measures taken by the Respondent prior to or during each arrangement to determine the compliance history of the Site where the treatment or disposal would actually take place.

A: SPRC specifically objects to this question as vague, ambiguous and calling for a legal conclusion. Without waiving these and other available objections, SPRC answers as follows: SPRC has no information of the kind requested.

- 19.Q: Describe in general detail the types of material that your company arranged for the transportation of or transported for recycling at Chemetco. In your response, please provide answers to the following questions:

A: SPRC specifically objects to this question as vague, ambiguous and calling for legal conclusions. Without waiving these and other available objections, SPRC

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answers as follows: as explained above, SPRC did not arrange for transportation, or transport materials to the Site. The materials SPRC sold to Chemetco were post-consumer tin food containers recovered from household curbside bins used by the City of Louisville in conducting its curbside recycling program. The households were required under the program to take the paper labels off the cans and rinse out food before placing them in the bins for collection.

- (a) Give the generic name of each type of material shipped to Chemetco (e.g., scrap metal, batteries, scrap paper, scrap plastic, scrap textile (scrap material), scrap electronic equipment, etc.).

A: Recyclable Tin (Steel) which met the commercial specification for such material, i.e., ISRI Ferrous Scrap (FS-01) Code 213.

- (b) Specify the quantity (volume and weight) of materials your company sent to Chemetco for recycling on a year by year basis.

A: SPRC sold a total of 223,000 pounds of recyclable tin to Chemetco from 8/07/01 to 10/12/01.

- 20.Q: Provide any additional information and all documents that you believe relate to the type, nature and characteristics of the materials your company sent to the Chemetco Site.

A: Available responsive documents have been provided herewith.

Questions and Requests for Documents Related to Scrap Metal

- 21.Q: For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

- (a) List the years in which your company sent scrap metal to Chemetco and/or broker for recycling. In this list state the type and approximate quantity, volume and weight of scrap metal sent for each year.

A: See answer to Question 18 above.

- (b) Did a market exist for the scrap metal listed in your response to 21(a) above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).

A: Yes, a market existed for recyclable tin in the form of post-consumer food containers at approximately \$27-\$30 per ton for use as a substitute for virgin raw ma-

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terials. SPRC sold these materials to Chemetco (as did the prior operator of the Louisville Facility) and, after ceasing business with Chemetco in October 2001, SPRC continued to sell these materials to other customers at the prevailing market price for the same use, including Tube City.

- (c) What commercial specification grade did the scrap metal listed in your response to question 21(a) meet? Identify/list the commercial specification grades that each scrap metal identified in 21(a) met.

A: ISRI Ferrous Scrap (FS-01) Code 213.

- (d) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question 21(a)? Did this include burning as fuel, or for energy recovery, or incineration?

A: SPRC sold the recyclable tin to Chemetco for use as a replacement for virgin raw material, not for use as fuel or for energy recovery or incineration.

- (e) After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to question 21(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

A: It was SPRC's understanding that all of the recyclable tin sold to Chemetco by SPRC was made available for use as a feedstock. See also answer to Question 19 above.

- (f) Could the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

A: Yes. See answers to Questions 10 and 21(b) above.

- (g) Could any products made from the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.

A: Yes, recycled tin can be remelted as a replacement for virgin metal and the resulting material used to make products of the same kind made with virgin raw materials.

- (h) Did your company melt the scrap metal listed in your response to question 21(a) before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal. In addition, explain whether Chemetco ever received for processing "dross" or "skimmings" or "sludges" at the Site.

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A: No.

- (i) Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?

A: The transaction was an outright sale.

- (j) Describe the source of or the process that produced the materials.

A: See answer to Question 6 above.

- 22.Q: Did any of the scrap material sent to Chemetco contain other material(s) incident to or adhering to the scrap? If so, describe in detail.

A: No. See answer to Question 19 above.

- 23.Q: Did any of the material sent to Chemetco contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at Chemetco, after being received at the Site, or was the wire not stripped?

A: The recycled tin was baled, and the bales were held together with baling wire. The wire may have had a wax coating but no insulation.

- 24.Q: Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

A: No.

- 25.Q: Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question 21(a).

A: SPRC understood that the recyclable tin sold to Chemetco would be re-melted and used as a substitute for virgin raw materials, based on the nature of the materials SPRC provided to Chemetco, the payment by Chemetco of the prevailing market price for goods used as a substitute for virgin raw materials, Chemetco's arrangement and payment for the transport of the materials SPRC sold to it and the pre-existing commercial relationship of the prior operator of the Louisville Facility with Chemetco.

- 26.Q: What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable

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federal, state, or local environmental regulations or standards, and any amendments, with respect to scrap metal?

A: As noted above, upon taking over operation of the Louisville Facility, SPRC continued the commercial relationship with Chemetco established by the prior operator who had raised no issues regarding dealings with Chemetco. No additional steps were taken during the few months SPRC conducted business with Chemetco. SPRC ceased doing business with Chemetco after it received notice that a check made out to SPRC from Chemetco dated September 14, 2001 in payment for materials sold was returned by the bank for insufficient funds in early November 2001. SPRC was notified that Chemetco filed for bankruptcy on December 10, 2001. Upon ceasing to do business with Chemetco, SPRC began selling recyclable tin to Tube City, another recycler located in Glassport, PA, which continues as a customer today.

27.Q: Describe the efforts your company undertook with respect to the management and handling of the scrap metal listed in your response to question 21(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.

A: SPRC obtained and handled the post-consumer tin food containers sold to Chemetco according to customary practices in the industry, including the use of trained sorters and standard equipment to separate recyclable materials from garbage and non-recyclables. See also answer to Question 6 above.

28.Q: Provide all information in your possession that shows that your company was in compliance with applicable federal, state, and local environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap metal listed in your response to question 21(a).

A: SPRC operated the Louisville Facility in compliance with applicable environmental requirements during the relevant period. SPRC did not receive any notices of violation nor was it the subject of any claims alleging violations of applicable environmental laws in connection with operation of the Louisville Facility.

Question and Requests for Documents Related to Batteries

29.Q: For the following questions which relate to transactions involving batteries (lead-acid batteries, nickel-cadmium batteries, reject batteries, lithium, and other spent batteries), provide the requested information, and also provide copies of any documents that contain any information that is related to the response: N/A

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- (a) Provide an estimate of all shipments of whole batteries sent to the Site on an annual basis. In this list, provide an approximation of number of batteries, type of battery (e.g., lead-acid, nickel-cadmium, lithium, reject, or other) and quantity sent. N/A
- (b) What commercial specification grade did the batteries listed in your response to question 29(a) meet? Identify/list the commercial specification grades that each type of battery identified in question 29(a) met. N/A
- (c) Did a market exist for the batteries listed in your response to question 29(a)? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published). N/A
- (d) At the time of the transaction, what was the intended disposition of the batteries listed in your response to question 29(a)? N/A
- (e) What portion of the batteries listed in your response to question 29(a) were to be made available for use as a feedstock for manufacturing new saleable products? Explain how the portion identified in this answer was derived or calculated. N/A
- (f) Could the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details. N/A
- (g) Could any products to be made from the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details. N/A
- (h) Was the transaction between your company and Chemtco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date? N/A
- (i) What, if any, components of the whole batteries listed in your response to question 29(a) were removed before transport to the Site? Describe what was removed, and where such removal occurred. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components. N/A
- (j) Were the components of the whole batteries removed once delivered to the Chemtco Site? Describe the method used to recover the components. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components. N/A
- (k) Describe the source of or the process that produced the materials. N/A

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- 30.Q: Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the batteries identified in your response to question 29(a). N/A
- 31.Q: What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable federal, state, or local environmental regulations or standards, and any amendments with respect to batteries? N/A
- 32.Q: Describe the efforts your company undertook with respect to the management and handling of the batteries listed in your response to question 29(a), including the extent to which you complied with customary industry practices current at the time of the transaction, designed to minimize contamination of the Site and/or releases of hazardous substances at the Chemetco Site. N/A
- 33.Q: Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of batteries listed in your response to question 29(a). N/A
- 34.Q: For the following questions which relate to transactions involving scrap paper, plastic, glass, textiles or rubber (scrap material), provide requested information, and also provide copies of any documents that contain any information that is related to the response:
N/A.
- (a) Provide an estimate of all shipments of scrap paper, plastic, glass, textile or rubber your company sent to Chemetco on an annual basis. In this list, include the type and an estimate of the quantity, volume and weight of scrap material sent to the Site each year.
 - (b) What commercial specification grade did the scrap material listed in your response to question 36(a) meet? List/identify the commercial specification grades that each scrap material identified in 36(a) met.
 - (c) Did a market exist for the scrap materials listed in your response to question 34(a) above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (d) At the time of the transaction(s), what was the intended disposition of the scrap material listed in your response to question 34(a)? Did the intended disposition include burning as a fuel, or for energy recovery or incineration?
 - (e) After sale, transfer, delivery, or disposal, what portion of the scrap material listed in your response to question 36(a) was to be made available for use as a feedstock for

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manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

- (f) Could the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products to be made from the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Describe the source of or the process that produced the materials.
- 35.Q: Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the scrap material identified in your response to question 34(a). N/A.
- 36.Q: What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemtco was in compliance with applicable federal, state, or local environmental regulations or standards, and any amendments with respect to scrap material? N/A.
- 37.Q: Describe the efforts your company undertook with respect to the management and handling of the scrap material listed in your response to question 34(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site. N/A.
- 38.Q: Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap material listed in your response to question 34(a). N/A.

Question and Request for Documents Related to Electrical and Electronic Equipment

- 39.Q: For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response: N/A.
- (a) List an estimated number of shipments of electrical and electronic equipment your company sent to Chemtco on an annual basis. In this list, include the following:
 - (i) the type and quantity, volume and weight of electrical and electronic equipment sent;

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- (ii) the amount paid or collected in connection with the transaction for each category of electrical and electronic equipment and the method of payment.
 - (b) At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 39(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?
 - (c) Describe the source of or the process that produced the materials.
- 40.Q: Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the electrical and electronic equipment identified in your response to question 39(a). N/A.
- 41.Q: What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemtco was in compliance with applicable federal, state, or local environmental regulations or standards, and any amendments with respect to electrical and electronic equipment? N/A.
- 42.Q: Describe the efforts your company undertook with respect to the management and handling of the electrical and electronic equipment listed in your response to question 39(a), including the extent to which your company complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site. N/A.
- 43.Q: Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of the electrical and electronic equipment listed in your response to question 39(a). N/A.